UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

GETRONICSWANG CO., LLC,

Plaintiff,

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Civil Action No. 04-12382 (RCL)

HYNIX SEMICONDUCTOR, INC. and SAMSUNG ELECTRONICS CO., LTD.

Defendants.

LOCAL RULE 16.1 CERTIFICATION

Defendant Samsung Electronics Co., Ltd, and its counsel hereby certify that they have conferred: (a) with a view to establishing a budget for the costs of conducting the full course-and various alternatives courses--of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Respectfully submitted,

Counsel for Samsung Electronics Co., Ltd.

Samsung Electronics Co., Ltd.

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Dated: [6/6/05]

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